



JONATHAN SUSSMAN, ESQ.

391 E. 149th Street, Suite 205A, Bronx, NY 10455

Mobile: 215-913-9894 Office: 347-218-9289 Fax:

718-744-2977 Sussmanlawpc.com

E-Mail: lawyerjonathansussman@gmail.com

July 7, 2020

By ECF

Honorable Ronnie Abrams
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application granted. Mr. Burgos shall
voluntary surrender on October 26, 2020.

SO ORDERED.

A handwritten signature in blue ink, appearing to be "Ronnie Abrams", written over a horizontal line.

Ronnie Abrams, U.S.D.J.

July 8, 2020

Re: **United States v. Ariel Burgos**
18 Cr. 570 (RA)

Dear Honorable Judge Abrams:

Pursuant to a retainer, I am the attorney retained to represent defendant Ariel Burgos in the above-captioned matter. Mr. Burgos has been released with a condition of home confinement since his arrest on July 17, 2018. The next current scheduled activity on his case is July 21, 2020 for his self-surrender.

The defense respectfully submits this letter requesting that the Court allow for an extension of time of three months until he has to self-surrender. As we informed the Court in our last communication, Mr. Burgos' fiancé was expecting a child in August. She arrived early but so early that there were complications as might have been expected. His daughter is going to be fine despite being so premature but his wife has

been suffering both physically and mentally and has been bedridden so far. His daughter will ultimately be fine but the complications with his fiancé make it incumbent upon Mr. Burgos to do as much as he can to care for both his daughter and his fiancé during these initial months of great importance for their health and wellbeing. To consolidate things even further, the health crisis is unabated. As the Court is no doubt aware, the COVID-19 pandemic, while mutated and dimmed a bit in New York City, is in strong force in the FCI and Federal inmate and correctional facility populations. These populations are exactly where Mr. Burgos would be headed to stay for the next three years, minus merit time and half-way house transfers. So long as he is in good stead with all of the requirements of his home confinement and pre-trial services requisites, which he is, then he would be requesting a three month delay to his self-surrender.

Mr. Burgos, as all parties are aware and would agree with, continues to be in good stead with pre-trial services. Further, the Government had no objection to this request at its inception. Seeing how the pandemic has only spread further into the FCI community and he now has a sick wife and new born baby of only a week old to care for, we cannot see how any objection would now issue. Please let us know if we can further address any issues or concerns in light of this important request to Mr. Burgos and his family.

Respectfully submitted,

s/Jonathan Sussman

Jonathan Sussman
Defense Attorney for Mr. Burgos
347-218-9289